R E M A R K S

Claim 1-2 and 4 stand rejected under 35 USC 102(e) as being anticipated by Lee.

In response, the Applicant respectfully submits that the claims recite features not anticipated by Lee. In particular, such features include "encoding the second sequence of data blocks in such a manner that all data blocks are predictively encoded with respect to those data blocks in the first sequence which serves as a reference", as recited in Claims 1-2 and 4.

In addressing this feature in the above rejection, column 3, lines 35-45, of Lee is being relied on. In column 3, lines 35-45, Lee discloses:

"The prediction block 208 performs a predictive coding on a current block based on the sets of quantized coefficients of previously coded blocks and generates a set of DPCM coefficients for the current block."

In the above portion, Lee does not disclose that the previously coded blocks are from another sequence. Thus, Lee cannot be reasonably interpreted as disclosing "encoding the second sequence of data blocks in such a manner that all data blocks are predictively encoded with respect to those data blocks in the first sequence which serves as a reference", as required by the claims. Therefore, it is respectively submitted that this feature is not anticipated by Lee.

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Claim 3 stands rejected under 35 USC 102(e) as being anticipated by Parke.

In response, the Applicant respectfully submits that the claims recite features not anticipated by Parke. In particular, such features include "decode the second sequence of data blocks in such a manner that all data blocks are predictively decoded with respect to those data blocks in the first sequence which serves as a reference".

In addressing this feature in the above rejection, column 11, lines 15-41, of Parke is being relied on. In column 11, lines 15-41, Parke discloses:

"The next frame to arrive is frame 6, which again has been coded by the forward predictive method, with reference to frame 3. Thus, after spatial decompression, the processor 54 decodes frame 6, with reference to motion vectors and to the reference values stored in store A and supplies the decoded values for frame 6 to the selector 55."
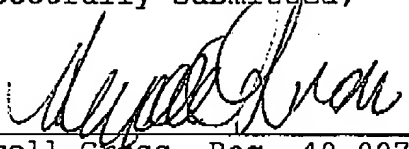
In the above portion, Parke does not disclose that the motion vectors and reference values are from another sequence. Thus, Parke cannot be reasonably interpreted as disclosing "decode the second sequence of data blocks in such a manner that all data blocks are predictively decoded with respect to those data blocks in the first sequence which serves as a reference", as required by

the claim. Therefore, it is respectfully submitted that this feature is not anticipated by Parke.

In view of the above-described distinctions, it is respectfully submitted that the invention of Claims 1-4 is not anticipated by either Lee or Parke. Therefore, it is respectfully requested that the above rejections be reconsidered and withdrawn so that the present application may proceed to issue.

The Commissioner is hereby authorized to credit any overpayment or charge any fee (except the issue fee) to Account No. 14-1270.

Respectfully submitted,

By _____

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